

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

UNITED STATES

v.

JOSEPH ALLEN

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Joseph Allen, the defendant in the above-captioned criminal case, hereby moves this Court to modify his conditions of release by permitting him to attend Christmas Dinner at the home of his mother, Linda Allen, at 64C Eastern Point Rd. in Gloucester from 9:00 a.m. until 2:00 p.m. on Saturday, December 25, 2004. The government has informed undersigned counsel that it has no objection to the allowance of this motion. Pretrial Services have informed undersigned counsel that Mr. Allen is in full compliance with his conditions of release and that they have no objection to the allowance of this motion.

Respectfully submitted,
JOSEPH ALLEN
By his attorney,

James L. Sultan, BB0 #488400
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the government by mailing a copy thereof, to AUSA David Tobin, Moakley Federal Courthouse, One Courthouse Way, Suite #9200, Boston, MA 02210 and US Pretrial Services Officer Christopher Wylie, Moakley Federal Courthouse, One Courthouse Way, Suite #1300, Boston, MA 02210 on December 20, 2004.

James L. Sultan